

PATRICK D. ROBBINS (CABN 152288)  
Acting United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

ERIC CHENG (CABN 274118)  
AJAY KRISHNAMURTHY (CABN 305533)  
ALETHEA M. SARGENT (CABN 288222)  
Assistant United States Attorneys

1301 Clay Street, Suite 340S  
Oakland, California 94612  
Telephone: (510) 637-3680  
FAX: (510) 637-3724  
Eric.Cheng@usdoj.gov  
Ajay.Krishnamurthy@usdoj.gov  
Alethea.Sargent@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DEVON CHRISTOPHER WENGER,  
  
Defendant.

CASE NO. 23-cr-268 JSW-2

**Declaration of Ajay Krishnamurthy In Support Of  
USA Memorandum in Opposition of Defendant's  
Motion for Reconsideration**

I, Ajay Krishnamurthy, declare as follows:

1. I am an Assistant United States Attorney assigned to prosecute the above-captioned criminal matter.

2. Attached hereto as Exhibit 1 is a true and accurate copy of a letter memorializing that the United States made documents bearing Bates numbers WIT268-000001 – WIT268-000090 available for inspection on April 9, 2025.

3. Attached hereto as Exhibit 2 is a true and accurate copy of document bearing Bates numbers US2-000599–US2-000610. This document was produced to defendant Wenger on January 2,

1 2024.

2 4. Attached hereto as Exhibit 3 is a true and accurate copy of a document bearing Bates  
3 number WIT268-000001 – WIT268-000004. This document was made available for inspection to  
4 defendant Wenger on April 9, 2025.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
6 and accurate to the best of my knowledge. Executed this 24th day of April, 2025 in Oakland, California.

7  
8 /s/ Ajay Krishnamurthy  
AJAY KRISHNAMURTHY  
9 Assistant United States Attorney  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28